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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

UNITED STATES OF AMERICA,

Case No: 6:15-CV-00143-MA

Plaintiff,

v.

COMPLAINT

**32683 Hidden Meadows Drive, Eugene,
Lane County, State and District of Oregon,
Real Property with Buildings,
Appurtenances, and Improvements, *in rem*,**

Defendant.

Plaintiff, United States of America, by S. Amanda Marshall, United States Attorney for the District of Oregon, and Amy E. Potter, Assistant United States Attorney, for its complaint *in rem* for forfeiture, alleges:

COMPLAINT *in rem* FOR FORFEITURE

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COUNT 1

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendant, *in rem*, 32683 Hidden Meadows Drive, Eugene, Lane County, State and District of Oregon, Real Property with Buildings, Appurtenances, and Improvements (herein after known as “32683 Hidden Meadows Drive”) and more particularly described as follows:

Lot 27, HIDDEN MEADOWS, as platted and recorded December 18, 2003, Reception No. 2003 120977, Lane County Deeds and Records, in Lane County, Oregon

is now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendant, *in rem*, 32683 Hidden Meadows Drive, represents proceeds traceable to an exchange for controlled substances or was used or intended to be used to facilitate such a transaction in violation of 21 U.S.C. § 801, *et. seq.*, and is forfeitable to the United States pursuant to the provisions of 21 U.S.C. § 881(a)(7), as more particularly set forth in the declaration of Christopher M. Luh, Special Agent, Federal Bureau of Investigation, marked as Exhibit A, attached and fully incorporated herein by this reference.

COUNT 2

IV.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 18 U.S.C. § 1956; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

V.

Defendant, *in rem*, 32683 Hidden Meadows Drive, was seized in the District of Oregon, and is now and during the pendency of this action will be within the jurisdiction of this Court.

VI.

Defendant, *in rem*, 32683 Hidden Meadows Drive, constitutes property, real or personal, involved in a money laundering transaction or attempted transaction or property traceable to money laundering offenses, in violation of 18 U.S.C. § 1956 and is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) and 981(a)(1)(C), as more particularly set forth in the declaration of Christopher M. Luh, Special Agent, Federal Bureau of Investigation marked as Exhibit A, attached and fully incorporated herein by this reference

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendant, *in rem*, 32683 Hidden Meadows Drive; that due notice be given to all interested persons to appear and show cause why forfeiture of this defendant, *in rem*, should not be decreed; that due proceedings be had thereon; that this defendant be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this action.

Respectfully submitted this 27th day of January 2015.

S. AMANDA MARSHALL
United States Attorney

s/ Amy E. Potter
AMY E. POTTER
Assistant United States Attorney

VERIFICATION

I, Christopher M. Luh, declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Federal Bureau of Investigation and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Christopher M. Luh
CHRISTOPHER M. LUH
Special Agent
Federal Bureau of Investigation